

Hearing Date: July 23, 2020 at 10:00 a.m. (E.T.)  
Objection Deadline: July 20, 2020 at 4:00 p.m. (E.T.)

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**NOTICE OF MOTION OF THE PRIVATE INSURANCE CLASS CLAIMANTS  
FOR LEAVE TO FILE CLASS PROOFS OF CLAIM**

**PLEASE TAKE NOTICE** that on July 2, 2020, Eric Hestrup, *et al.* (collectively, “Private Insurance Plaintiffs”), in their individual and representative capacities (and with the class members, collectively, the “Private Insurance Class Claimants”) in their respective actions (the “Private Insurance Class Actions”), filed their *Motion of The Private Insurance Class Claimants for Leave to File Class Proofs of Claim* for entry of an order granting the Private Insurance Class Claimants leave to file one or more class proofs of claim, as may be appropriate (the “Motion”) with the Court.

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “Hearing”) on the Motion is scheduled for **July 23, 2020 at 10:00 a.m. (E.T.)** before The Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that pursuant to General Order M-543, dated March 20, 2020 (Morris, C.J.) (“General Order M-543”), the Hearing will be conducted telephonically. Parties wishing to appear at, or attend, the Hearing must refer to and comply with the Bankruptcy Court’s guidelines for telephonic appearances and make arrangements with Court Solutions LLC by telephone at (917) 746-7476.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion shall be in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, filed with the Bankruptcy Court, and served in accordance with the Second Amended Order Establishing

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Certain Notice, Case Management, and Administrative Procedures entered on November 18, 2019 [Docket No. 498], so as to be filed and received no later than **July 20, 2020 at 4:00 p.m. (E.T.)**.

**PLEASE TAKE FURTHER NOTICE** that objecting parties are required to attend the Hearing telephonically so long as General Order M-543 is in effect or unless otherwise ordered by the Bankruptcy Court. Failure to appear may result in relief being granted upon default.

Respectfully submitted,

Dated: July 2, 2020

By: /s/ Nicholas F. Kajon

One of the Attorneys for Private Insurance Plaintiffs

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<sup>2</sup> Morgan & Morgan, P.A. also represent clients in diverse other matters pending against the Debtors, as specified in the Second Amended Verified Statement of Stevens & Lee, P.C. Pursuant to Bankruptcy Procedure 2019, dated May 26, 2020 [Dkt. No. 1181].